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January 20, 2004

VIA FACSIMILE

Howard J. Schulman, Esquire
Schulman & Kaufman, LLC
One Charles Center
100 N. Charles Street, Suite 600
Baltimore, MD 21201

RE: Bond v. Blum

Dear Mr. Schulman:

I have your fax letter of even date.

The first delay was two days before the scheduled deposition. The process this time was slowed by the fact that we did not adjourn Court until after 5:00 p.m. on Friday, January 16, 2004; yesterday was a holiday so that the Judges could not confer and no decision be made by them until today. I will assure you though that this cancellation of your deposition was not at my initiation but was at the suggestion of the Court to avoid inconveniencing members of at least two law firms, other than my own, numerous litigants and witnesses and to avoid delaying ongoing litigation.

As to your comment about *ex parte* communications with the Court, there were none. I never discussed this matter with Judge Garbis. Judge Bennett, with the knowledge and assent of all counsel in my other case spoke to me at the bench to ask me whom I was deposing and whose case it was. I advised him you were the deponent and it was Judge Garbis' case. Judge Bennett then, today, had a conversation with Judge Garbis and I was contacted thereafter by Judge Bennett's chambers. So, I have not spoken with Judge Garbis nor his staff; Judge Garbis has not spoken with me. So much for *ex parte* communications.

It was never my intent to inconvenience you and I am sorry about the cancellation as well. I am more than willing to set a date after March 8, 2004 and would be happy to discuss dates with you. Perhaps if you will send me some dates and times that are

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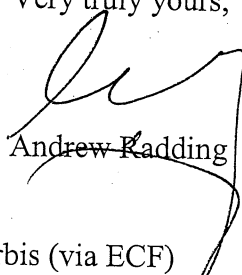
Howard J. Schulman, Esquire

January 20, 2004

acceptable after March 8, 2004, we can agree on one promptly which hopefully will not be interrupted or delayed.

I do not think a telephone conference with the Court is necessary since I am more than willing to accede to your request for a date after March 8, 2004.

Very truly yours,


Andrew Radding

AR/kle

cc: The Honorable Marvin J. Garbis (via ECF)